

Date that this Privacy Policy was last updated: May 2024.

## 1. What is this document and why should you read it?

This fair processing notice (from now on called the “**Privacy Policy**”) explains how and why FTR Pty Ltd, FTR Limited, FTR Labs Pty Ltd and FTR Group Pty Ltd, (each a member of the “**For The Record Group**”, and referred to collectively in this Privacy Policy as the “**Company**”, “**we**”, “**our**” and/or “**us**”) uses personal data about those individuals who purchase goods or services from us, supply goods or services to us, visit our website at [fortherecord.com](https://fortherecord.com) and [app.fortherecord.com](https://app.fortherecord.com) (each the “**website**”), or otherwise communicate or engage with us (referred to as “**you**”).

The specific personal data collected and the way in which it is used and otherwise processed may vary, depending upon which of our websites you access.

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give to you, that might apply to our use of your personal data in specific circumstances in the future.

## 2. Our data protection responsibilities

“**Personal data**” is any information that relates to an identifiable natural person. Your name, address and contact details are all examples of your personal data, if they identify you.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

The For the Record Group may be a so-called “**controller**” or “**processor**” of your personal data, depending on the services we provide as outlined in this Privacy Policy. When the Company is a “controller”, we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services. For example, we require an accurate name and email to process orders.

For public access to For The Record’s compliance and overall security posture, visit: <https://trust.fortherecord.com/>. For The Record uses an external automation platform to continuously monitor 100+ security controls across the organization.

### 3. What types of personal data do we collect and where do we get it from?

We collect different types of personal data about you when you visit our website, purchase something from us or otherwise communicate or engage with us. We also obtain some personal data from other sources (including from Google or Microsoft, as applicable, if you choose log into your account using your Google or Microsoft credentials), and create some personal data ourselves.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting [dataprotection@fortherecord.com](mailto:dataprotection@fortherecord.com).

We collect your personal information from various sources. The table below sets out the different types of personal information that we may collect and the sources we collect it from.

Category	Type of personal data	Collected from
Contact information	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone number</li> <li>Email address</li> <li>Organization details (e.g., your place of work, job title and organization contact information)</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Third parties when information is collected in the performance of the For the Record Group’s contracts with our clients to provide audio and transcription services</li> </ul>

Category	Type of personal data	Collected from
	<ul style="list-style-type: none"> <li>Your marketing preferences</li> </ul>	

Single Sign-On Account Information	<ul style="list-style-type: none"> <li>Name</li> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>Google or Microsoft, as applicable, if you choose to log into your account using your Google or Microsoft credentials</li> </ul>
Background and Identity Check Information	<ul style="list-style-type: none"> <li>Contact Information (see above)</li> <li>Sensitive Information (see below)</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Third party systems used for our identity checks</li> </ul>
Customer Supplier Information	<ul style="list-style-type: none"> <li>Contact Information (see above)</li> <li>Order information for goods and services purchased or sold by you (or your organization)</li> <li>Payment information</li> <li>You/your organization's banking details</li> <li>Fraud checks or flags raised about your transactions, payment card refusals</li> <li>Delivery details</li> <li>Communications we may have with you, whether relating to a transaction or not. Please note that we may record calls to our customer services team</li> <li>Any additional information that you provide to us voluntarily or for account security, including (for example) date of birth or mother's maiden name</li> <li>Responses to surveys</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Third party fraud checking service</li> <li>Your/your organization's bank</li> </ul>

Website Information	<ul style="list-style-type: none"> <li>• Contact Information (see above)</li> <li>• IP address and other online identifiers / web beacons</li> <li>• Details of the pages of our Website(s) that you have browsed, such as the pages, products or areas of our website(s) that you visit (please see the cookies section, below)</li> <li>• User names, for our website(s) and other log-in information</li> </ul>	<ul style="list-style-type: none"> <li>• Device used to access the website</li> <li>• Our website(s)</li> </ul>
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Category	Type of personal data	Collected from
	<ul style="list-style-type: none"> <li>• Your account settings for our website(s) including any default preferences, any preferences we have observed, such as the types of offers that interest you, or the areas of our website that you visit.</li> </ul>	
Sensitive Information	<ul style="list-style-type: none"> <li>• Information relating to actual or suspected criminal convictions and offences may be processed</li> <li>• Other sensitive information (e.g., race, ethnic origin, religious beliefs, trade union membership, physical or mental health condition, sex life and sexual orientation) may also be collected.</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties when information is collected in the performance of the For the Record Group's contracts with our clients to provide audio and transcription services</li> </ul>

#### 4. What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your use of the website, the provision of services or goods from us to you (or vice versa) and to our applicable clients, your communication or other engagement with us and the management and administration of our business.

We are required by law to always have a so-called “lawful basis” (i.e. a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated in the table that our processing of your personal data is either:

- a) necessary for us to comply with a legal obligation; or
- b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

Lawful Basis				
Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
<b>Contact Information</b>				
a) Responding to your enquiries and/or customer complaints		✓		✓ (It's important that we can respond to you in relation to such matters)

Lawful Basis
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Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
b) Sending you information (including direct marketing and surveys) as set out in the section "How do we communicate with you?", below	✓			✓ (It's important to keep you updated of orders made with us and notified of factual updates to our engagement with you)
<b>Single Sign-On Account Information</b>				
c) If you choose to sign into your account using your Google or Microsoft credentials, Google or Microsoft – as applicable – will share with us your name and email address, so that we can verify your identity and manage your account	✓			
<b>Background and Identity Check Information</b>				
d) In certain limited circumstances this information is collected for the purposes of processing fee waiver applications on behalf of court clients			✓	✓ (We need to ensure that the identity of our customers/suppliers is verified)
e) Performing identity checks in relation to certain engagements and/or employment with us			✓	✓ (We need to ensure that the identity of our customers/suppliers is verified)

Website Information				
f)	To review the relevance and popularity of the website content and assist with marketing material to you (PLEASE ALSO SEE THE COOKIES SECTION BELOW)			✓ (We need to ensure the website functions correctly)
g)	To improve the functionality of the website			✓ (It is in our interest to keep the website up to date and improve its functionality for the benefit of users)

Lawful Basis				
Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
h) To enable you to create accounts and log-in to them via the website		✓		✓ (It is in our interests to grant you access to a private log-in where you can access information relevant to you)
Customer / Supplier Information				
i) To take payment and deliver services to you or the business you represent, to deal with any complaints or any after sales services		✓		
j) To protect genuine customers and our business from fraud, to minimize the risk of false details being used, and abuse of card details by fraudsters		✓		✓ (It is important that seek to limit incidents of fraud)
All Categories				
k) Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity			✓	
l) Complying with instructions from law enforcement agencies, any court or otherwise as required by law			✓	
m) For our general record-keeping and customer/supplier relationship management		✓		✓ (We need to store customer/supplier related information so we can refer back to it)
n) Managing the proposed sale, restructuring, or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organization			✓	✓ (We have a legitimate interest in being able to sell any part of our business)



o) To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws			✓	
p) Resolving any complaints from or disputes with you		✓		✓ (We need to be able to try and resolve any

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand and improve the use of our website.

## 5. Sensitive Information

Some of the processing described in the above table may include the processing of ‘special categories of personal data’ and/or sensitive personal data (together, “**Sensitive Information**” – as set out in the table at **paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws.

The table below sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Sensitive Information – lawful basis				
Purposes of processing	You have given <b>your explicit consent</b> to the processing	It is necessary to protect somebody's <b>vital interests</b> , or they are incapable of giving consent	It is necessary for the establishment, exercise or defense of <b>legal claims</b>	It is necessary for reasons of <b>substantial public interest</b>
Performing identity checks and providing recording and transcription services, as a data processor.	✓ ✓		✓ ✓	

## 6. Who do we share your personal data with and why?

Sometimes we need to disclose your personal data to other people. The Company does not share your personal data with third parties for the third parties own marketing purposes.

### Inside the For the Record Group:

We are part of the For the Record Group, which includes companies and operations globally. Therefore, we will need to share your personal data with other companies in the For the Record Group for our general business management purposes and, in some cases, to meet our customer needs where providing services across branches/locations and/or for authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

Access rights between members of the For the Record Group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any For the Record Group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate technical and organisational measures in place to make sure your personal data is protected.

### Outside For the Record Group:

From time to time, we may ask third parties to carry out certain business functions for us, such as the administration and development of our website. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate technical and organisational measures in place to protect your personal data. Examples of these third-party service providers include our outsourced IT systems software. We send information to 3<sup>rd</sup> parties and/or subcontractors so that we can provide our services to you, improve the goods and services that we provide, and to develop new goods and services.

We have set out below a list of some of the categories of recipients with whom we are likely to share your personal data:

- a) services provided to you or us by a third party acting independently to us, but which has a relationship with us, for example certain payment fraud checking services;
- b) the purchase or sale of our business (or part of it) in connection with a share or asset sale, for which we may disclose or transfer your personal data to the prospective seller or buyer and their advisors;
- c) the disclosure of your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others
- d) IT support;
- e) payment processors and payment gateway providers in relation to purchases you make with us;
- f) consultants and professional advisors including legal advisors and accountants;
- g) courts, court-appointed persons/entities,
- h) receivers and liquidators;
- i) business partners and joint ventures;
- j) insurers; and

- k) governmental departments, statutory and regulatory bodies.

## 7. Where in the world is your personal data transferred to?

As part of an international organisation, we may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above requires your personal data to be transferred from within to outside the European Economic Area, we will only make that transfer if:

- a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient and appropriate technical and organisational measures
- c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- d) you explicitly consent to the transfer.

We engage the services of various third-party vendors and suppliers, and work closely with our related bodies corporate, who assist us in providing our services and managing our business internally. As a result of our relationship with these third parties and depending on the purpose for which we have collected your personal data, your personal data may be transferred to entities in the following regions:

Activity	Regions
IT service providers for administrative applications and functions	United States of America European Union United Kingdom Canada Australia
IT service providers for sales processes (including credit processing)	United States of America European Union United Kingdom Canada Australia
IT service providers for data hosting	United States of America European Union United Kingdom Canada Australia
Locations of related bodies corporate of FTR Group	United States of America Australia United Kingdom

## 8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate technical and organisational measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

## 9. How long do we keep your personal data for?

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- a) any laws or regulations that we are required to follow;
- b) whether we are in a legal or other type of dispute with each other or any third party;
- c) the type of information that we hold about you; and
- d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

### **10. How do we communicate with you?**

We will use your personal data to communicate with you:

- a) in relation to any purchases you make with us;
- b) to administer our relationship with you;
- c) to respond to any questions or complaints that you may have;
- d) to improve our current goods and/or services, and to develop new goods and/or services; and
- e) to invite you to take part in market research or request feedback on our products and services.

From time to time and (if required) with your opt-in consent, we will provide you with information about our products, services, promotions and/or offers which may be of interest to you. Such communications will be sent either by email, text, post or telephone.

If you do not wish to receive such communications, you can opt-out at any time by either following the instructions within the communication or contacting [dataprotection@fortherecord.com](mailto:dataprotection@fortherecord.com).

## 11. Credit information

Some of the functions we perform mean that we necessarily collect, use and disclose credit information about you. Credit information is a type of personal data that relates to your bank and credit card details, payment history, credit history, default and insolvency history, and other information and opinions regarding your current and previous financial standing.

The credit information we may collect from you is limited to the information collected under the “Customer Supplier Information” heading in the above paragraph 3.

## 12. Cookies and Other Tracking Technologies

We partner with third parties (e.g., Google Ads) to either display advertising for our Websites or to manage our advertising on other sites. Our third-party partner(s) may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may learn more about how to opt-out by clicking [here](#) (or if located in the European Union click [here](#)). Please note this does not opt you out of being served all ads. You will continue to receive generic ads.

When you visit the website, we or our third party partners may generate one or more “cookies”, which are deployed with your consent (if required).

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the website. Please be aware that if you disable cookies, this may impact your user experience while using the website.

The table below summarizes the different types of cookie used on the website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).

Two types of cookies may be used on the website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the website. A persistent cookie remains on your device for much longer or until you manually

delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

Cookies which may be used on the website:

Type of Cookie	What do they do?	Do these cookies collect my personal data/identify me?
Necessary	Cookies that are essential to making the website work correctly. They enable visitors to move around our website and use our features. Examples include remembering previous actions (e.g., entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual.  If you do not accept these cookies, it may affect the performance of our website.
Performance	Cookies that help us understand how visitors interact with our web properties by providing information about the areas visited, the time spent on the website and any issues encountered, such as error messages. They help us improve the performance of our websites, alert of any concerns and more.	These cookies don't identify you as an individual. All data is collected and aggregated anonymously.
Functionality	Cookies that allow our web properties to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalized online experience.	The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it.  If you do not accept these cookies, it may affect website performance and functionality and may restrict access to web content.
Targeting	Cookies that collect information about your browsing habits to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by our digital advertising company with our permission.	The information these cookies collect includes an IP address. It is possible that your IP address, taken together with other information, may constitute personally identifiable information. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it.



## What are Cookies?

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit the website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e., how long it will remain on your device) and a value, which is usually a randomly generated unique number.

We use cookies to make the website easier to use and to better tailor our web presence and products to your interests and needs. Cookies may also be used to help speed up your future activities and experience on the website. We may also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. We cannot identify you personally from this information.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

## Do Not Track.

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

### **13. Links to Third Party Sites**

Our Website includes links to other third-party sites for your convenience and information whose privacy practices may differ from those of the Company. If you submit personal information to those third-party sites, your information is administered by their privacy policy. We encourage you to take care in reading the privacy policy of any web site you may visit.

#### 14. What are your rights in relation to your personal data and how can you exercise them?

Where our processing of your personal data is based on your **consent** (please see the tables above), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know.

Where our processing of your personal data is based on the **legitimate interests** (please see the tables above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing.

You have the right to (subject to applicable laws and certain limitations):

- a) access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- b) require us to correct any inaccuracies in your personal data without undue delay;
- c) require us to erase your personal data;
- d) require us to restrict processing of your personal data;
- e) receive the personal data which you have provided to us, in a machine-readable format, where we are processing it based on your consent or because it is necessary for your contract with us (please see the tables above) and where the processing is automated; and
- f) object to a decision that we make which is based solely on automated processing of your personal data (however, we do not currently conduct any such decision making).

You also have the right to lodge a complaint with us directly about our practices in respect of your personal data, as well as the relevant Supervisory Authority (in the UK this would be the

Information Commissioner's Office, and in Australia this is the Office of the Australian Information Commissioner, for example). Where you submit a complaint with us, we will process your complaint, conduct an internal investigation of your complaint and respond to you promptly with our findings and proposed outcomes.

### **15. Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by updating the Privacy Policy on our website. We also encourage you to check this notice on a regular basis.

### **16. Where can you find out more?**

If you want more information about any of the topics covered in this privacy notice or if you would like to discuss any issues, complaints or concerns with us, you can contact us at:

Email:

[Info@fortherecord.com](mailto:Info@fortherecord.com)